

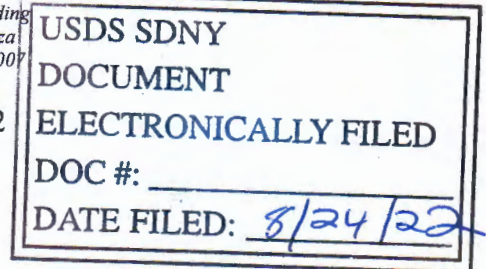


U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 24, 2022

**BY ECF**

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Ronald Goland*, S1 21 Cr. 78 (KMW)

MEMO ENDORSED

Dear Judge Wood:

The Government writes, on behalf of the parties, in advance of the conference scheduled in this matter for August 30, 2022. In short, the parties submit that an adjournment, and corresponding exclusion time, of approximately 90 days would be appropriate.

The Government and defendant Ronald Goland are continuing to discuss a potential resolution and the parties believe that an adjournment would be appropriate to facilitate those discussion.

If the Court agrees, the Government respectfully requests that the Court exclude time, pursuant to 18 U.S.C. § 3161(h)(1)(A), until the date of the next conference. The Government submits that the ends of justice served by an exclusion of time outweigh the best interests of the defendants and the public in a speedy trial, because such an exclusion will allow the parties to continue discussing a potential pretrial resolution. In addition, such an exclusion will help ensure the effective assistance of counsel and help avoid any possible miscarriage of justice. Counsel for defendant Ronald Goland consents to the request.

*The conference is adjourned to
November 29, 2022, at 11:00a.m.
Time is excluded, pursuant to
18 USC 3161(h)(1)(A), through
November 29, 2022.*

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:

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SO ORDERED: N.Y., N.Y. 8/24/22

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.